

1 memory of it?

2 A I believe that was who I was speaking of, and
3 it was clear to me that U.S. Attorney
4 Sullivan was also speaking about
5 Nurse Porter.

6 Q In the second paragraph of Exhibit 8, you
7 start with a reference to the June 16th
8 meeting. If you go to Exhibit 6, the third
9 paragraph at the bottom of Page 1, the last
10 two lines talk about that you answered,
11 "Truthfully and unequivocally that
12 Sheila Porter's assignment to the department
13 was not cancelled because she provided
14 information to the FBI or your office.
15 Indeed, we had a candid and substantive
16 discussion regarding the actual and
17 appropriate reasons for that cancellation."

18 Did I read that correctly?

19 A You did.

20 Q What were the actual and appropriate reasons
21 that were expressed in the June 16th meeting
22 to Mr. Sullivan and others as to the reason
23 for cancelling Miss Porter's ability to come
24 into the facility?

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1 A They were in a shorter, more concise version,
2 what I previously testified to as to my
3 reasons for barring her. There was also --
4 I remember that Elizabeth Keeley spoke.
5 I think Viktor Theiss also spoke as well.
6 The sum and substance of it was that there
7 was no documentation in the medical record;
8 that a report wasn't given to us in a timely
9 manner. What we received was not a
10 confidential report. There was an issue
11 about the backdating of the report. There
12 was additional conversation around some of
13 the other things that concerned us, the
14 subsequent appearance of Maureen Robinson at
15 the facility the next day.

16 And it was all happening -- this
17 conversation was all happening sort of at the
18 same time. So there were a number of things
19 that were said. I remembered it as a candid
20 and substantive discussion, but I don't have
21 an exact recollection as to what everyone
22 said and what everyone responded and what the
23 questions were.

24 Q Are the reasons that you gave to Mr. Sullivan

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1 and the others at this meeting for
2 Miss Porter's barring different in any way to
3 the reasons that you indicated in your prior
4 testimony of why you made the decision to bar
5 her?

6 A I don't recall them as being different.

7 Q So you believe you gave both no fewer and no
8 larger number of reasons to Mr. Sullivan than
9 you've given in your testimony here as for
10 your reason for barring Miss Porter?

11 MS. CAULO: Objection.

12 A I could not say that. I could not say that.
13 I don't have a specific recollection -- I
14 need to put this in context. When we go to a
15 meeting with the U.S. Attorney, the first
16 assistant and the SAC, Ken Kaiser, we go to
17 this meeting believing that the
18 conversation -- or I should say that I went
19 to this meeting believing that we were going
20 to have a conversation about how to improve
21 the relationship between the U.S. Attorney's
22 Office, the FBI and the Sheriff's Department,
23 because historically that relationship had
24 not been good.

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